

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

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In re:

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CHARLES MARTIN
Debtor

Case 20-18680-MCR
Chapter 7

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**TRUSTEE'S OPPOSITION TO DEBTOR'S MOTION TO CONTINUE THE HEARING
SCHEDULED FOR MAY 8, 2024 AND MOTION FOR APPROPRIATE RELIEF**

Cheryl E. Rose, the Chapter 7 Trustee of the above captioned bankruptcy estate, by and through her counsel, Cheryl E. Rose, Esq. and Rose & Associates, LLC, opposes the Debtor's Motion to Continue the Hearing Scheduled for May 8, 2024 and Motion for Appropriate Relief (hereinafter "Opposition") and states as follows:

1. The Debtor is requesting a continuance of the above hearing but has failed to provide any legitimate reason for that request.
2. The Debtor does not have standing in this case to object to this sale or to request a continuance due to the Debtor's own actions in this case as the administrative expenses are presently higher than any monies the Trustee has received. In addition, the Debtor has failed to obey the Orders of this Court to pay the sanctions previously ordered (See Dockets 393 and 446).
3. Although Debtor asserts that proper service has not been effectuated, pursuant to the Operating Agreement of MY1STHOUSE.COM, LLC, the title owner of the property, Mr. Martin is the 100% owner of that entity. See Pages 4, 6 and 21 of that document previously

provided by the Debtor as Exhibit A attached hereto. Additionally, the Estate is only selling this asset “as is” and the Purchaser understands that it must deal with any liens or other obligations attached to this property.

4. The Debtor is asserting that he needs “super competent legal counsel” to assist him in this matter. Mr. Martin has used this same dilatory tactic throughout this bankruptcy case and has yet to obtain any counsel let alone “super competent legal counsel”. Further this Debtor should not be allowed at this juncture to participate in this case when he has failed to attend the originally scheduled Chapter 7 §341 meeting or the two continued §341 meetings.

5. As usual, Mr. Martin is blaming everything and everyone else but himself for the difficulties that have arisen in this case. It is clear that only Mr. Martin and his actions have made this case difficult.

6. The Trustee has no confidence that the Debtor can provide any assistance in this case when his actions to date have only seriously complicated this case. He has never provided any “assistance” he has only provided roadblocks to the administration of this case.

7. The Trustee is unavailable on the suggested date of June 5, 2024 at 2:00 pm due to a previously scheduled vacation.

WHEREFORE, the Trustee requests that the Court (1) deny the Debtor’s Motion to Continue the Hearing Scheduled for May 8, 2024 and Motion for Appropriate Relief; (2) and grant such other and further relief as it deems just.

Respectfully submitted,

ROSE & ASSOCIATES, LLC

/s/ Cheryl E. Rose

Cheryl E. Rose, Chapter 7 Trustee, #05934
9812 Falls Road, #114-334
Potomac, MD 20854
(301) 527-7789

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of May, 2024, copy of the foregoing Trustee's Opposition to Debtor's Motion to Continue the Hearing Scheduled for May 8, 2024 and Motion for Appropriate Relief will be served electronically by the Court's CM/ECF system on the following:

- **Glenna Elizabeth Barner** Glenna.Barner@maryland.gov
- **Leah Christina Freedman** bankruptcy@bww-law.com, leah.freedman@bww-law.com
- **Marie Louise Hagen** mlh@mlhagenlaw.com
- **Keith R. Havens** Keith.R.Havens@HavensLawFirm.com, Madeline.Reed@HavensLawFirm.com
- **James M. Hoffman** jhoffman@offitkurman.com, mmargulies@offitkurman.com
- **Nicole C. Kenworthy** bdept@mrrlaw.net
- **Lynn A. Kohen** lynn.a.kohen@usdoj.gov
- **Darren Michael Margolis** dmargolis@lawdmmpa.com
- **Shannon Jacob Posner** sjposner@posner-law.com
- **L. Jeanette Rice** Jeanette.Rice@usdoj.gov, USTPRegion04.GB.ECF@USDOJ.GOV
- **Cheryl E. Rose** trusteerose@aol.com, crose@ecf.axiosfs.com
- **Roger Charles Simmons** rsimmons@gordonsimmons.com, dwise@gordonsimmons.com; jdziubla@gordonsimmons.com
- **Lisa Yonka Stevens** lisa.y.stevens@usdoj.gov
- **William Scott Tinney** scott@cohenandformanlaw.com
- **US Trustee - Greenbelt** USTPRegion04.GB.ECF@USDOJ.GOV
- **Maurice Belmont VerStandig** mac@mbvesq.com, lisa@mbvesq.com; mahlon@dcbankruptcy.com;mac@dcbankruptcy.com;verstandig.mauricer104982@notify.be stcase.com;verstandiglaw@recap.email
- **Brett Weiss** brett@bankruptcylawmaryland.com, brettecf@gmail.com; TheWeissLawGroup@jubileebk.net;chetan@BankruptcyLawMaryland.com;kbanks@bankru ptcylawmaryland.com

I HEREBY FURTHER CERTIFY that on this 7th day of May, 2024, a copy of the foregoing Trustee's Opposition to Debtor's Motion to Continue the Hearing Scheduled for May 8, 2024 and Motion for Appropriate Relief was mailed first class mail, postage prepaid to the following:

James H. Brandon
16905 Germantown Road
Germantown, MD 20874

Charles Martin
5803 Lowery Lane
Upper Marlboro, MD 20772
(also sent via email)

United States Marshals Service
Attention: Mathew Silverman, Chief
6500 Cherrywood Lane
Greenbelt, MD 20770

Andrew A. Werner
REMAX Realty Group
6 Montgomery Village Ave., Suite 200
Gaithersburg, MD 20879

/s/ Cheryl E. Rose
Cheryl E. Rose, #05934